



CenturyLink™

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EX PARTE NOTICE

April 30, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Developing an Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92;
Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket
No. 07-135; *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On Thursday, April 26, 2019, Tim Boucher and Julie Ward (by phone) and Joe Cavender and I, on behalf of CenturyLink, met with Lisa Hone, Pam Arluk, Victoria Goldberg, John Hunter, Edward Krachmer, Al Lewis, Joseph Price, Doug Slotten, and Shane Taylor of the Wireline Competition Bureau regarding direct interconnection in the above-captioned docket.

CenturyLink explained its position that inefficient and unwanted arbitrage in intercarrier compensation arrangements frequently is caused by a disconnect between the responsibility for determining how traffic should be routed and the financial responsibility for that traffic. Ideally, Commission policies and rules would be reformed in these circumstances so that a carrier with financial responsibility would also be able to decide how traffic is routed. To that end, CenturyLink discussed the possibility of shifting financial responsibility where a carrier declines to accept a request for direct interconnection for the purpose of terminating access traffic. CenturyLink then advised that it intends to file a proposal for such a rule in the coming weeks.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced docket. Please contact me if you have any questions.

Sincerely,

Copies via email to: Lisa Hone, Pam Arluk, Victoria Goldberg, John Hunter, Edward Krachmer, Al Lewis, Joseph Price, Doug Slotten, and Shane Taylor